

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALACIVIL ACTION NO. 2:06CV1079 WKW
(To be supplied by Clerk of
U.S. District Court)ANTHONY DELL HENDON, #159738
Full name and prison number
of plaintiff(s)v. Brian Mitchell, Psychologist,BOB RILEY, GOVERNOR; RICHARD ALLEN, Commr;BWENDALYN MASELEY, WARDEN; PAUL W. HALEY,Director of Classification, MS BROWN, Central Records;LATICE GREENE, Director of Classification Estabing;
Charlette Wilson, Classification Specialist; SHANEYWILLIAMS, CHAIRMAN; WILLIAM C. SEBEST, Director Parole Bd.Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO (☒)B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO (☒)C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/ADefendant(s) N/A2. Court (if federal court, name the district; if
state court, name the county) N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT EASTERLING CORR. FAC. 200 Wallace Drive, Clib Alabama 36017

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Alabama State Capitol, Central Records of ALDOC, Alabama Parole Board Central Office

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. Bob Riley, State Capitol, 600 Dexter Avenue, Room N-103, Montgomery, AL 36130
Brian Mitchell, 200 Wallace Drive, Clib, AL 36017
2. Richard Allen, ALDOC, 14 N. Union Street, Montgomery, AL 36130
Gwendolyn Mosley, 200 Wallace Drive, Clib, AL 36017
3. Latrice Greene, 200 Wallace Drive, Clib, AL 36017
Brian Mitchell, 200 Wallace Drive, Clib, AL 36017
4. Charlotte Wilson, 200 Wallace Drive, Clib, AL 36017
Paul Whaley, 1400 Lloyd Street, Montgomery, AL 36130
5. Ms Brown, 1400 Lloyd Street, Montgomery, AL 36130
Sidney Williams, Central office, 301 S. Ripley Street, Montgomery, AL 36130-2405
6. William C. Segrest, Central office, 301 S. Ripley Street, Montgomery, AL 36130-2405

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED On or about April 2005
and November 16, 2006 continuously

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Defendants herein acted in concert to make Plaintiff the victim of
Overcrowded, Lack of Security, Health Hazard situation and misappropriate use of
Government Funds for Pre-SAP, Crime Bill and Aftercare programs at Easterling Corr. Fac.
For ALDOC in Violation of Plaintiff Eighth and Fourteenth Amendment of the United States Const.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Defendants Riley, Allen, Moseley, Mitchell, Whaley, Brown, Green, Wilson Force Plaintiff
to take Counter-productive programs of Pre-SAP-Crime Bill and Aftercare in order to
relieve Government Funding even though this is a repeat of the same criteria in the
same Norms 9 and 10 at Easterling Corr. Fac. which is overcrowded, rat and insect infested,
with foul tasting greasy firm drinking water. Bunks often are packed together so closely that
Sanitation and Security is impossible to maintain. Defendants continue to bring in more inmates
from County Jails, and refuse to follow SAP, for ALDOC, in order to hold Plaintiff to repeat programs for funds again.

GROUND TWO: Defendants Williams and Segrest acts in concert with other defendants
Riley, et al, to deliberate indifference Plaintiff from other inmates granted parole because
of their elite status and funds.

SUPPORTING FACTS: Defendants Williams and Segrest grants parole to other inmates
who have concern family members with funds and lawyers to represent them at their
parole hearings plus under the table tips and contribution to parole Board members.
Plaintiff contend that he was denied this same opportunity of equality because
he had no family members, lawyer or funds to contribute to Parole Board members;
was left in the system to relundry through these ALDOC Counter productive Programs for
more funds from the Government for Defendants herein to split.

GROUND THREE:

SUPPORTING FACTS:

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff seek Jury trial, injunctive relief for defendant to fix overcrowding, stop racketeering the Federal Government for funds by deceptive means under the guise of treatment, to grant Plaintiff and other inmates parole equally ending this deliberate indifference, and stop punitive treatment of Plaintiff. For punitive treatment of Plaintiff in this overcrowding, lack of security, Health Hazard situation Plaintiff seek Five (5) million dollars in punitive damages and Attorney fees.

Anthony Henderson
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on *12/4/2006*
(Date)

Anthony Henderson
Signature of plaintiff(s)